

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
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*Executive Director*

*Southern District of New York*  
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*Attorney-in-Charge*

March 11, 2021

**BY ECF**

The Honorable Judge Paul G. Gardephe  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**RE: United States v. Joanna DeJesus, et al.**  
**20 Cr. 397 (PGG)**

Honorable Judge Gardephe:

I write to request a temporary modification to Joanna DeJesus's bail conditions to allow her to travel to the District of New Jersey to attend a baby shower on Saturday, March 20, 2021. The Government and Pretrial Services do not object to this request.

On February 11, 2020, Ms. DeJesus was presented in Magistrate Court and the following bail conditions were set and subsequently met:

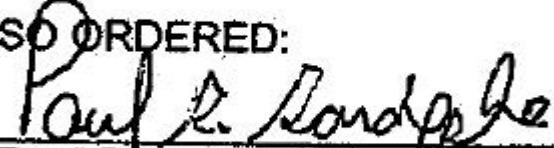
\$50,000 personal recognizance bond to be co-signed by two financially responsible persons for moral suasion; compliance with pre-trial supervision as directed; surrender of travel documents with no new applications and travel restricted to the Southern and Eastern Districts of New York; no possession of firearms/destructive devices/other weapons; no new lines of credit or bank accounts; and no contact with the alleged victim or co-defendant outside the presence of counsel.

Ms. DeJesus now respectfully requests that the bail conditions be temporarily modified to allow her to travel to the District of New Jersey to attend a friend's baby shower on Saturday, March 20, 2021. Ms. DeJesus has remained in compliance with all of the conditions of her pretrial release since her arrest more than one year ago. The Government and Pretrial Services do not object to this request.

**MEMO ENDORSED**

**The Application is granted.**

**SO ORDERED:**

  
Paul G. Gardephe, U.S.D.J.

**Dated:** March 16, 2021

Respectfully submitted,

/s/  
Marne L. Lenox  
Assistant Federal Defender  
(212) 417-8721

**SO ORDERED:**

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**HONORABLE PAUL G. GARDEPHE**  
United States District Judge

cc:     Rebecca Dell, Assistant U.S. Attorney  
         Dominique Jackson, Pre-Trial Services Officer